

DEC 10 1991



December 3, 1991

Reply To
Attn Of: HW-074

Roger Stanley
Program Manager
Nuclear and Mixed Waste Management Program
State of Washington
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504-8711



Re: Review of the Hanford Federal Facility Dangerous Waste Permit

Dear Mr. Stanley:

Our respective staff have worked together on the Hanford Federal Facility Dangerous Waste Permit for some time. Even with the numerous bi-monthly Unit Manager meetings since February, issues remain that must be resolved or completed prior to the scheduled draft issuance date in mid-January. A great deal of work remains to be completed in a very compressed time period. I am concerned that without very aggressive management, the permitting schedule cannot be met, and the April date for starting construction on the Hanford Waste Vitrification Plant (HWVP) will be delayed.

In order for the U.S. Environmental Protection Agency (EPA) to review the permit prior to public notice it was agreed that EPA would be provided a complete draft permit on December 6, 1991, and a complete fact sheet on December 15, 1991. These documents are necessary to support the logistics of planning and conducting the required public comment review and public hearings.

According to the Tri-Party Agreement, Ecology was to conduct and complete the corrective action portion of the permit. As our staff agreed, and to support the permit development, we have conducted the RCRA Facility Assessment (RFA) required under RCRA 3004(u) with participation of one member of your staff. In order for EPA to provide Ecology with a draft RCRA Corrective Action Section, Ecology should provide EPA with all documentation Ecology staff developed in the initial stages of the RFA by December 6, 1991. The final RFA is scheduled to be completed and, along with final the Corrective Action Section IV, will be provided to you by December 31, 1991.

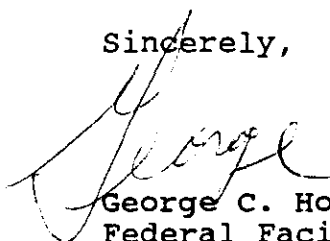
An EPA review of the most recently available copy of the draft permit indicates that for the Nonradioactive Dangerous Waste Storage Facility (NRDWSF), few if any requirements are imposed other than what is included in the Part B application. Our review of the October 31, 1991, Part B application for NRDWSF found the application to be quite incomplete and unenforceable.

To be complete, the application needs major revisions which cannot be accommodated by the enclosed schedule.

Enclosed is a permitting schedule which was developed by starting at the required issuance date and working backwards with the required timeframes for permit issuance. As you can see from a review of this schedule, as currently conceived, it will be virtually impossible to meet. You may wish to consider limiting the scope of this initial permit, which now includes the 616 Nonradioactive Dangerous Waste Storage Facility, the Hanford Waste Vitrification Plant, as well as the interim status closure plans for the 183-H Solar Evaporation Basins, 2727-S Dangerous Waste Storage Facility, the 300 Area Solvent Evaporator, and the Simulated High-Level Waste Storage Area. One way to meet the schedule would be to limit the scope of the initial permit to the HWVP.

I believe this task will need your direct involvement during the next several months if we are to finalize the Hanford Federal Facility Dangerous Waste Permit on schedule. Please call me at (206) 553-2803 if you wish to discuss this further.

Sincerely,



George C. Hofer, Chief
Federal Facilities Superfund Branch

Enclosure

cc: Paul Day, EPA
Narda Pierce, Ecology
Randy Smith, EPA

	1991		1992			
	November	December	January	February	March	April
o Redraft Permit	13-----	29				
o Draft Permit						
to EPA		29 ----	6			
o Community Relations						
Plan to EPA	13-----	6				
- Review & Finalize		6--	20			
- Announcements		6-15				
o Draft Section IV						
to Ecology	13-----	15				
o Draft FACT SHEET						
to EPA	13-----	15				
o Final Draft Permit						
to EPA		6----	31			
o RFA Complete	13-----	31				
- VSI	18-22					
- Draft RFA	25-----	15				
o Corrective Action						
Section IV Final		6----	31			
o Prepare For Public						
Comment Period			31-15			
o Public Comment Period						
-45 Days			15-----	29		
-Public Hearings				22- 29		
o Issue Responsiveness						
Summary					29----	14
Statement of Basis						
o Sign & Issue Permit					14-----	13
o Effective Date						13

TBD

- o Community Relations Plan
- o Permit Meeting(s): EPA & Ecology: December 1991
EPA/Ecology & Energy: December 1991

NOTE: ITEMS ADDED 11/18/91 BY EPA REGION 10.